



Sandra E. Mayerson
sandy@mhlaw-ny.com
646-778-4381

May 13, 2020

The Hon. James L. Garrity, Jr.
United States Bankruptcy Court
One Bowling Green
New York, NY 10004

Re: Status Report on Unlocked Media, Inc.,
and Unlocked Operations US Inc., Case No. 18-13243

Dear Judge Garrity:

The debtors and debtors-in-possession (the “Debtors”) in the above-captioned jointly administered case wish to provide you with the following update concerning the case in lieu of a status conference which had been scheduled for May 12, 2020, and is now adjourned to July 14, 2020.

Since the last status conference, the Debtors have executed an engagement letter with the firm of Boies Schiller Flexner (“BSF”) to serve as Debtors’ special antitrust counsel on a contingency basis. We have reviewed the proposed engagement letter, as well as proposed redactions to the engagement letter which we would like to effectuate when filing the letter publicly, with Mr. Benjamin Higgins of the Office of the U.S. Trustee. We have worked with Mr. Higgins, and he has now signed off on both the engagement letter and the proposed redactions to the engagement letter to be filed with the application to engage BSF. We are now working with BSF on the application, and intend to file the application with the Bankruptcy Court shortly.

The Debtors believe that engaging BSF as special antitrust counsel to fight Google paves the way to confirmation of the Debtors’ Combined Plan and Disclosure Statement. Accordingly, the Debtors will shortly be filing the proposed order which Your Honor had previously approved in principle at the hearing on February 5, 2020, setting forth the proposed schedule for soliciting acceptances and moving forward with a disclosure statement and confirmation hearing. Attached to the proposed order will be a revised redlined Combined Plan and Disclosure Statement which discloses that BSF has been engaged, and that the application to approve such engagement is pending. We are hopeful that both the BSF retention and confirmation can be heard on July 14, but if this does not prove feasible, the Debtors will seek an extension of exclusivity to confirm their plan.

The Debtors have continued with their day-to-day activities, including the collection of receivables. Since the last Status Report, the debtors have recovered approximately \$65,000 in old receivables.

Due to the coronavirus, the Debtors are somewhat behind in their Monthly Operating Reports, and may be behind in their payments to the U.S. Trustee. We are working with the Debtors' financial advisor to catch up on the Monthly Operating Reports. With respect to the US Trustee fees, the bills generally come to our office, and the Debtors' checkbooks to pay them are in the office, as well. As we have not been in the office since March 17, 2020, we do not know if there are any unpaid U.S. trustee fees. As soon as we can visit the office, we will catch up on any unpaid U.S. Trustee fees.

Our firm would be happy to answer any questions or concerns that the Court may have.

Sincerely,

/s/ Sandra E. Mayerson
Sandra E. Mayerson, Esq.

MAYERSON & HARTHEIMER,
PLLC
845 Third Avenue, 11th floor¹
New York, NY 10022
646-778-4381
646-778-4384
sandy@mhlaw-ny.com

¹ During the coronavirus pandemic, please address all mail to: 48 Seneca Drive, Dobbs Ferry, NY 10522